

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HARBINGER CAPITAL PARTNERS MASTER FUND I, LTD.; AURELIUS CAPITAL MASTER, LTD.; AURELIUS CAPITAL PARTNERS, LP; ARROW DISTRESSED SECURITIES FUND; SCHULTZE MASTER FUND, LTD.; LATIGO MASTER FUND, LTD.; UBS WILLOW FUND, LLC; MISSOURI STATE EMPLOYEES' RETIREMENT SYSTEM; BLACKROCK GLOBAL FLOATING RATE INCOME TRUST; BLACKROCK LIMITED DURATION INCOME TRUST; BLACKROCK SENIOR INCOME SERIES; BLACKROCK SENIOR INCOME SERIES II; BLACKROCK SENIOR INCOME SERIES III PLC; MAGNETITE V CLO, LIMITED; BLACKROCK SENIOR LOAN PORTFOLIO; HARCH CLO II, LTD.; and RZB FINANCE LLC,

Plaintiffs,

-against-

WACHOVIA CAPITAL MARKETS, LLC d/b/a WACHOVIA SECURITIES; BDO SEIDMAN, LLP; GREGORY J. PODLUCKY; and ROBERT LYNN,

Defendants.

MOTION TO ADMIT  
COUNSEL PRO HAC VICE

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States

District Courts for the Southern and Eastern Districts of New York, I, HARVEY

KURZWEIL, a member in good standing of the bar of this Court hereby move for an

Order allowing the admission pro hac vice of:

Applicant's Name: KATHERINE GORDON MAYNARD  
Firm Name: Robinson, Bradshaw & Hinson, P.A.  
Address: 101 N. Tryon Street, Suite 1900  
City/State/Zip: Charlotte, North Carolina 28246

Tel No: (704) 377-8101  
Fax No: (704) 339-3401

KATHERINE GORDON MAYNARD is a member in good standing of the Bars of the State of North Carolina and the Commonwealth of Kentucky. There are no pending disciplinary proceedings against KATHERINE GORDON MAYNARD in any State or Federal court.

Dated: October 18, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Harvey Kurzweil", is written over a horizontal line.

HARVEY KURZWEIL

Dewey & LeBoeuf LLP  
1301 Avenue of the Americas  
New York, NY 10019-6092  
Tel: (212) 259-8000  
Fax: (212) 259-6333

# KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET  
FRANKFORT, KENTUCKY 40601-1883  
(502) 564-3795  
FAX (502) 564-3225



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### *THIS IS TO CERTIFY THAT*

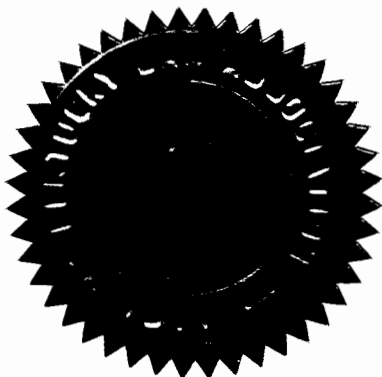
### ***KATHERINE GORDON MAYNARD***

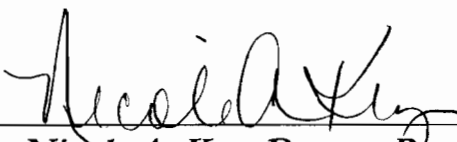
*Robinson, Bradshaw and Hinson PA  
101 North Tryon Street, Suite 1900  
Charlotte, North Carolina 28246*

***Membership No. 88197***

*is an active member in good standing with the Kentucky Bar Association as required by the Rules of the Supreme Court of Kentucky. Dated this 11<sup>th</sup> day of October, 2007.*

***JAMES L. DECKARD  
REGISTRAR***



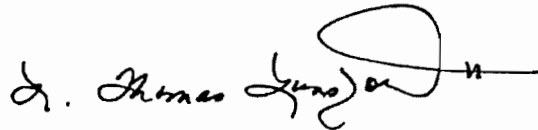
By:   
***Nicole A. Key, Deputy Registrar***

## The North Carolina State Bar

I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Katherine Gordon Maynard (26837) is an active member of the North Carolina State Bar in good standing as of this date, and was duly licensed to practice law in this state on August 21, 1999.

I further certify that as of this date the above named attorney has not been subject to any public disciplinary action by the North Carolina State Bar.

Given over my hand and the Seal of the North Carolina State Bar, this 8<sup>th</sup> day of October, 2007.

A handwritten signature in cursive script, reading "L. Thomas Lunsford, II", followed by a horizontal line.

Secretary of the North Carolina State Bar

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**HARBINGER CAPITAL PARTNERS MASTER FUND I, LTD.; AURELIUS CAPITAL MASTER, LTD.; AURELIUS CAPITAL PARTNERS, LP; ARROW DISTRESSED SECURITIES FUND; SCHULTZE MASTER FUND, LTD.; LATIGO MASTER FUND, LTD.; UBS WILLOW FUND, LLC; MISSOURI STATE EMPLOYEES' RETIREMENT SYSTEM; BLACKROCK GLOBAL FLOATING RATE INCOME TRUST; BLACKROCK LIMITED DURATION INCOME TRUST; BLACKROCK SENIOR INCOME SERIES; BLACKROCK SENIOR INCOME SERIES II; BLACKROCK SENIOR INCOME SERIES III PLC; MAGNETITE V CLO, LIMITED; BLACKROCK SENIOR LOAN PORTFOLIO; HARCH CLO II, LTD.; and RZB FINANCE LLC,**

**Plaintiffs,**

**-against-**

**AFFIDAVIT OF HARVEY  
KURZWEIL IN SUPPORT  
OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

**WACHOVIA CAPITAL MARKETS, LLC d/b/a  
WACHOVIA SECURITIES; BDO SEIDMAN,  
LLP; GREGORY J. PODLUCKY; and ROBERT  
LYNN,**

**Defendants.**

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STATE OF NEW YORK     )  
                                  SS.:  
COUNTY OF NEW YORK    )

HARVEY KURZWEIL, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Dewey & LeBoeuf LLP, counsel for Defendant Wachovia Capital Markets, LLC, in the above-captioned action. I

am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Wachovia Capital Market, LLC's motion to admit Katherine Gordon Maynard as counsel pro hac vice to represent Defendant Wachovia Capital Markets, LLC in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on July 6, 1970. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I met Katherine Gordon Maynard in connection with this case.

4. Katherine Gordon Maynard is a partner at Robinson, Bradshaw & Hinson, P.A., and is located at 101 N. Tryon Street, Suite 1900, Charlotte, North Carolina 28246.

5. I have found Katherine Gordon Maynard to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

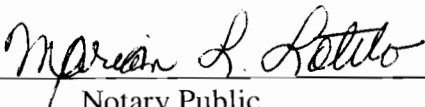
6. Accordingly, I am pleased to move the admission of Katherine Gordon Maynard, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Katherine Gordon Maynard, pro hac vice, which is attached hereto as Exhibit A.

WHEREAS, it is respectfully requested that the motion to admit Katherine Gordon Maynard, pro hac vice, to represent Defendant Wachovia Capital Markets, LLC, in the above-captioned matter, be granted.

  
HARRY KURZWEIL

Sworn to before me this  
12<sup>th</sup> day of October, 2007.

  
Notary Public  
MARIAN L. LOTITO  
NOTARY PUBLIC, State of New York  
No. 01LO6057552  
Qualified in Nassau County  
Certificate Filed in New York County  
Commission Expires April 16, 2011

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X

**HARBINGER CAPITAL PARTNERS MASTER FUND I, LTD.; AURELIUS CAPITAL MASTER, LTD.; AURELIUS CAPITAL PARTNERS, LP; ARROW DISTRESSED SECURITIES FUND; SCHULTZE MASTER FUND, LTD.; LATIGO MASTER FUND, LTD.; UBS WILLOW FUND, LLC; MISSOURI STATE EMPLOYEES' RETIREMENT SYSTEM; BLACKROCK GLOBAL FLOATING RATE INCOME TRUST; BLACKROCK LIMITED DURATION INCOME TRUST; BLACKROCK SENIOR INCOME SERIES; BLACKROCK SENIOR INCOME SERIES II; BLACKROCK SENIOR INCOME SERIES III PLC; MAGNETITE V CLO, LIMITED; BLACKROCK SENIOR LOAN PORTFOLIO; HARCH CLO II, LTD.; and RZB FINANCE LLC,**

**Plaintiffs,**

**-against-**

**ORDER FOR ADMISSION  
PRO HAC VICE ON  
WRITTEN MOTION**

**WACHOVIA CAPITAL MARKETS, LLC d/b/a  
WACHOVIA SECURITIES; BDO SEIDMAN,  
LLP; GREGORY J. PODLUCKY; and ROBERT  
LYNN,**

**Defendants.**

-----X

Upon the motion of Harvey Kurzweil, attorney for Defendant Wachovia Capital Markets, LLC, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: KATHERINE GORDON MAYNARD  
Firm Name: Robinson, Bradshaw & Hinson, P.A.  
Address: 101 N. Tryon Street, Suite 1900  
City/State/Zip: Charlotte, North Carolina 28246



Tel No: (704) 377-8101  
Fax No: (704) 339-3401  
Email: kmaynard@rbh.com

is admitted to practice pro hac vice as counsel for Defendant Wachovia Capital Markets, LLC, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2007

New York, New York

\_\_\_\_\_  
United States District Judge



**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK     )  
  SS.:  
COUNTY OF NEW YORK    )

JUDITH L. STRIGARO, being duly sworn, deposes and says: I am not a party to the action, am over 18 years of age and reside in New York, New York.

On the 18th day October, 2007, I caused the attached MOTION TO ADMIT COUNSEL PRO HAC VICE to be served via First Class Mail to the attorneys listed below at their address designated for service of papers as follows:

Robert S. Loigman, Esq.  
Quinn Emanuel Urquhart  
Oliver & Hedges, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010

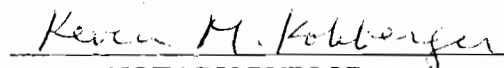
Cary B. Samowitz, Esq.  
DLA Piper US LLP  
1251 Avenue of the Americas  
New York, NY 10020

Gregory J. Podulucky  
345 Cobblestone Lane  
Ligonier, PA 15658

Robert B. Lynn  
3187 Route 711 South  
Ligonier, PA 15658

  
JUDITH L. STRIGARO  
Lic. No. 0770670

Sworn to before me this  
18th day of October, 2007

  
NOTARY PUBLIC  
KEVIN M. KOHBERGER  
NOTARY PUBLIC, State of New York  
No. 01K06147080  
Qualified in Kings County  
Certificate Filed in New York County  
Commission Expires May 30, 2010